



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

PHILIP R. SELLINGER
UNITED STATES ATTORNEY

*Samantha R. D'Aversa
Assistant United States Attorney*

*401 Market Street
P.O. Box 2098
Camden, NJ 08101
samantha.daversa@usdoj.gov*

*main: (856) 757-5026
direct: (856) 968-4928
fax: (856) 757-5416*

June 14, 2023

Via Electronic Filing

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: Letter Requesting Seven-Day Extension of Time to File a
Consolidated Reply**
B.Y.C.C., et al. v. United States, No. 22-cv-06586-MAS
J.A.L.C., et al. v. United States, No. 22-cv-06587-MAS
R.J.P., et al. v. United States, No. 22-cv-06588-MAS

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matters. We write with the consent of Plaintiffs' counsel to respectfully request an additional seven days for the United States to file a consolidated reply brief in further support of its motions to dismiss. The current date by which the United States must reply is June 16, 2023. If the Court grants the United States' extension request, its reply brief will be due on June 23, 2023. Good cause exists to grant a short extension because this Office is required to coordinate with other Department of Justice components in responding to the arguments made in Plaintiffs' consolidated opposition brief, and additional time is needed to obtain the requisite approvals.

If this proposal is acceptable to the Court, I respectfully request that Your Honor "so order" this letter and have the clerk file it on the docket. Thank you very much for your consideration of this request.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Samantha R. D'Aversa
SAMANTHA R. D'AVERSA
Assistant United States Attorney
Attorneys for the United States

cc: All counsel of record
AUSA John F. Basiak Jr.
AUSA Angela E. Juneau

So Ordered this 16th day of June, 2023.



Honorable Michael A. Shipp,
U.S.D.J.